

1 E. Vincent Wood (Bar No. 297132)
2 Law Offices of E. Vincent Wood
3 1501 N. Broadway, Suite 261
4 Walnut Creek, CA 94596
5 Tel. (925) 278-6680
6 Fax. (925) 955-1655

7 Attorney for Debtor

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re) Chapter 11 Case No.: 20-51623-SLJ
12 Sherry Virginia Seitzinger)
13 Debtor) DECLARATION OF DEBTOR IN SUPPORT
14) OF MOTION TO EXTEND AUTOMATIC
15) STAY
16)
17)
18)
19)

20 I, Sherry Virginia Seitzinger, hereby declare as follows:
21

- 22 1. I am the Debtor in the above-referenced case.
23 2. My prior Chapter 11 was dismissed on October 28, 2020 because I failed to file all
24 required bankruptcy schedules.
25 3. I expect my income to increase with more near-term income from renting my
26 properties.
27
28

- 1 4. My prior bankruptcy cases failed because I did not have legal counsel to assist me
- 2 with the bankruptcy process.
- 3 5. In 2013, I had legal representation but could not complete the Chapter 13 due to
- 4 recovering from severe complications from cancer.
- 5 6. I have now hired counsel for bankruptcy legal services and paid the upfront attorney
- 6 fees so that I can fully prosecute this case.
- 7
- 8 7. My petition in this case has been filed in good faith.
- 9
- 10 8. I am NOT attempting to hinder or delay or defraud our creditors.
- 11
- 12 9. I believe that the Chapter 11 plan will be confirmed and that I will be able to fully
- 13 perform under the terms of the plan.
- 14
- 15 10. I request a continuation of the automatic stay.

16 The above facts are known to me personally and if called to testify, I could and would so
17 testify. I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19
20 Date: November 23, 2020

/s/ Sherry Virginia Seitzinger
Sherry Virginia Seitzinger